AVESF 1-9.3V1

United States Environmental Protection Agency

Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

2 June 2009

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Reply to
Attn of: 1910 Northwest Boulevard, Suite 208
Coeur d'Alene, ID 83814

Terry Cundy
Manager, Silviculture, Wildlife and Environment
Potlatch Forest Holdings
530 South Asbury, Suite 4
Moscow ID 83843

Re: Approval with Modifications of Treatability Study Work Plan, Field Sampling and Analysis Project Plan, and Quality Assurance Project Plan
Administrative Settlement Agreement and Order on Consent
Docket No. CERCLA-10-2008-0135

Dear Mr. Cundy:

On 13 May 2009, Potlatch Corporation and Potlatch Forest Products Corporation (Respondents) submitted a Treatability Study Work Plan (TSWP), Field Sampling and Analysis Project Plan (SAP), and Quality Assurance Project Plan (QAPP) to the United States Environmental Protection Agency (EPA). The TSWP, SAP, and QAPP are plans that are required by the terms of the Administrative Settlement Agreement and Order on Consent (ASAOC) in docket number CERCLA-10-2008-0135.

EPA is hereby notifying Respondents of approval of these documents with the modifications set forth in the enclosure to this letter. This action by EPA is taken in accordance with Paragraph 17(b) of Section VIII and Paragraph 74 of Section XXVI of the ASAOC, and in consideration of 40 C.F.R. § 300.415(b)(4)(i) and (ii).

Please provide me with a copy of the final Support Plans which includes modifications set forth in the enclosure.

Sincerely

Earl Liverman
Federal On-Scene Coordinator

Enclosure

Cc: Richard Mednick, EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY RESPONSE TO THE DRAFT SUPPORT PLANS FOR THE ENGINEERING EVALUATION/COST ANALYSIS WORK PLAN FOR THE AVERY LANDING SITE (DATED 13 MAY 2009)

2 June 2009

Attachment A - Treatability Study Work Plan

The draft Treatability Study Work Plan (TSWP) that was submitted by Respondents, and is dated 13 May 2009, is hereby approved by EPA with the modifications specified below:

1. Reinsert the following sentence into Section 1.2 found on page 1 of the TSWP:

> "Water treatment and LNAPL removal technologies will be evaluated in the EE/CA."

2. The 3rd complete paragraph found on page 2 of the TSWP is deleted in its entirety, and the following paragraph is included in the TSWP:

> "The analytical results from the various soil fractions and residuals resulting from soil washing will be compared to the following criteria, guidelines, and cleanup standards in the Treatability Study Report: EPA Removal Action Level Guidelines and Regional Screening Levels; Idaho Risk Evaluation Manual concentrations for soil and groundwater; federal drinking water standards; Idaho water quality standards; NOAA Screening Quick Reference Tables, Freshwater Sediment Criteria; and the Consensus-Based Sediment Quality Guidelines for Freshwater Ecosystems, as applicable."

3. The 3rd paragraph found on page 5 of the TSWP is deleted in its entirety, and the following paragraph is included in the TSWP:

> "A report will be prepared on completion of the testing, documenting the study methodology and analytical results. The analytical results will be presented in a narrative discussion and compared against the EPA Removal Action Level Guidelines and Regional Screening Levels; Idaho Risk Evaluation Manual concentrations for soil and groundwater; federal drinking water standards; Idaho water quality standards; NOAA Screening Quick Reference Tables, Freshwater Sediment Criteria; and the Consensus-Based Sediment Quality Guidelines for Freshwater Ecosystems, as applicable."

4. Table 1 found in the TSWP is revised to include the following analyses: TCL VOCs, TCL SVOCs, and TAL metals.

Attachment B - Field Sampling and Analysis Project Plan (SAP)

The draft Field Sampling and Analysis Project Plan (SAP) that was submitted by Respondents, and is dated 13 May 2009, is hereby approved by EPA with the modifications specified below:

1. Where found in the SAP, "carcinogenic" PAHs is revised to PAHs.

2. Where found in the SAP, "air-rotary hammer" drilling is revised to "hollow-stem auger" drilling.

3. Section 3.1.1.3, found on page B-6 of the SAP is deleted in its entirety, and the following section is included in the SAP:

> *"3.1.1.3 Selection of Soil Samples for Chemical Analyses*
>
> The test pit spoils (or drilling drive samples) will be inspected for indication of the presence of petroleum hydrocarbons based on field screening methods (i.e., visual signs, olfactory senses, sheen testing, and PID measurements). Soil samples will be placed in glass sample bottles that are appropriate for chemical analyses.
>
> The laboratory analytical methods that Test America Analytical Services are to use are as follows:
>
> - Northwest Total Petroleum Hydrocarbons for diesel and extended range organics (NWTPHDx);
> - EPA Method 8270C for poly-aromatic hydrocarbon compounds, naphthalene, 1-methynaphthalene, and 2-methylnapthalene; and
> - EPA Method 8082 for polychlorinated biphenyls on surface samples at each sampling location.
>
> Additionally, soil samples collected from the seven test pits from the western portion of the Site will also be analyzed for the following analytical methods:
>
> - EPA Method 8260B - Target Compound List (TCL) volatile organic compounds (VOCs);
> - EPA Method 8270C - TCL semi-volatile organic compounds (SVOCs); and
> - EPA Methods 6010C/6020A and 7471B - Target Analyte List (TAL) Metals.

All obtained soil samples will be sent to Test America Analytical Services laboratory in Spokane, Washington."

4. Section 3.2.1.3, found on page B-10 of the SAP is deleted in its entirety, and the following sections is included in the SAP:

"3.2.1.3 Chemical Analysis of Monitor Well Boring Soil Samples

Soil samples collected from the well borings to be analyzed will be sent to Test America Analytical Services laboratory in Spokane, Washington for analyses of the following constituents in accordance with QAPP (Appendix A) requirements:

- EPA Method 8260B – TCL VOCs;
- EPA Method 8270C - TCL SVOCs;
- EPA Methods 6010C/6020A and 7471B – TAL Metals;
- Diesel and Heavy Oil Range Total Petroleum Hydrocarbons (NWTPHDx); and
- PCBs – EPA Method 8082."

5 The 1st complete paragraph found on page B-8 of the SAP is deleted in its entirety.

6. Section 3.2.2.4 found on page B-15 of the SAP is deleted in its entirety, and the following section is included in the SAP:

"3.2.2.4 Chemical Analysis of Groundwater Quality and LNAPL Samples

Groundwater and LNAPL samples will be analyzed at Test America Analytical Services laboratory in Spokane, Washington for the following components:

- Diesel and Heavy Oil Range Total Petroleum Hydrocarbons (NWTPHD-Dx);
- PAHs – EPA Method 8270C;
- Naphthalene, 1-Methylnapthalene, and 2-Methylnapthalene – EPA Method 8270C;
- PCBs (only from GA-1, GA-2, GA-3, GA-4 wells and LNAPL samples) – EPA Method 8082; and
- TAL Metals – EPA Methods 6010C/6020A and 7470A."

7. Section 3.3.1.4 found on page B-15 of the SAP is deleted in its entirety, and the following section is included in the SAP:

> *"3.3.1.4 Chemical Analysis of Sediment, Surface Water, and LNAPL Samples*
>
> "Sediment, LNAPL, and surface water will be analyzed at Test America Analytical Services laboratory in Spokane, Washington for the following components:
>
> - Diesel and Heavy Oil Range Total Petroleum Hydrocarbons (NWTHP-Dx);
> - PAHs – EPA Method 8270C;
> - Naphthalene, 1-Methylnapthalene, and 2-Methylnapthalene – EPA Method 8270C;
> - TCL VOCs (sediment only) – EPA Method 8260B;
> - TCL SVOCs (sediment only) – EPA Method 8270C;
> - PCBs – EPA Method 8082; and
> - TAL Metals - EPA Methods 6010C/6020A and 7470A/7471B."

Appendix A - Quality Assurance Project Plan

The draft Quality Assurance Project Plan (QAPP) that was submitted by Respondents, and is dated 13 May 2009, is hereby approved by EPA with the modifications specified below:

1. Where found in the QAPP, "carcinogenic" PAHs is revised to PAHs.

2. Section 6.0 found on page 12 of the QAPP is deleted in its entirety, and the following section is included in the QAPP:

> **"6.0 DATA REDUCTION, VALIDATION, AND REPORTING**
>
> **6.1 Minimum Requirements for Laboratory Analytical Data Packages**
>
> All analytical data packages submitted by the analytical laboratory shall consist of EPA Contract Laboratory Program (CLP)-equivalent deliverables and include the following:
>
> - Sample receipt "condition found" records, noting dates of sample collection, shipment, laboratory receipt, and disposition of sample quality including temperature, breakage, and custody seals.

- Shipping receipt documentation including identification of shipping personnel (or organization).

- Copies of completed chain of custody documentation including communications of field personnel by hand written note, facsimile, or e-mail transmittal.

- Analytical hard copy (paper) summary results for each sample containing neat or dilution adjusted results for all analytes/constituents requested in the chain of custody and request for analysis or purchase order.

- Analytical quality control results and summary documents for laboratory method blanks, laboratory duplicates, laboratory control samples, blank spike/blank spike duplicates, matrix spike/matrix spike duplicates, serial dilutions, quality reference materials, surrogates and internal standards.

- Sample extraction and preparation summary data including dates of sample extraction and analysis and analytical sequence information for each sample set, and each sample dilution and reanalysis.

- A cross-reference of laboratory sample to project sample identification numbers, a description of data qualifiers, sample preparation and analysis methods, raw data for sample results and laboratory QC samples, results of dated initial and continuing calibration checks, GC tuning results, and labeled/dated chromatograms/spectra.

- Electronic data diskettes or electronic deliverables that provide the summarized results, date of extraction and analysis, quality control data results and true values, client and laboratory sample identifications, analysis methods, dilutions applied, and appropriate detection or reporting limits.

All data packages for all analytical parameters shall be reviewed and approved by the analytical laboratory's QA Officer before submittal for validation.

6.2 General Validation Requirements

All analytical data packages from each sample delivery group shall be validated by the detailed review and calculation over-check processes described in "U.S. EPA Contract Laboratory Program National Functional Guidelines for Low Concentration Organic Data Review" (EPA, 2001) and "U.S. EPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review" (EPA, 2004). Data validation work will be performed in order to ensure that the laboratory has met all contractual requirements, all

applicable reference method requirements, and has met the data quality objectives discussed previously in Section 3 and listed in Tables QAPP-5 through QAPP-7. Validated data will be stored as indicated in procedure TP-2.2-12, "Analytical Data Management" for each sample delivery group. A sample delivery group may be interpreted as a group of 20 samples, or the group of samples delivered to the laboratory in a single sampling event.

The data validator shall document all contacts made with the laboratory to resolve questions related to the data package. The data validator shall complete a data validation checklist applicable for the specified method, documenting the evaluation of holding times, laboratory and field blanks, laboratory and field duplicates, matrix spikes/matrix spike duplicates, laboratory control samples, method calibration data, internal standards, surrogates, and any qualification of analytical results required as a consequence of QC deficiencies. The validation checklist, laboratory contact documentation, copies of the laboratory sample summary reports, and the as-reviewed laboratory data package shall be routed to the Project Manager for data assessment purposes and to the permanent project records."

3. QAPP Tables - General Comments.

- Shading definition will be consistent between all Tables (e.g., QAPP-5 through QAPP-7).
- Water quality criteria references will be consistent in all Tables (e.g., IDTLs are not included in Table QAPP-5 and aquatic life criteria are not provided in Tables QAPP-6 and QAPP-7).
- Sediment criteria will be referenced in QAPP Tables 5, 6, and 7.
- EPA Removal Action Levels and Regional Screening Levels will be included in QAPP Tables 5, 6, and 7.

4. Table QAPP-2. The maximum holding time for SVOC/PAH waters will be revised from 14 days for extraction to 7 days for extraction.

5. QAPP Table 5.

- Separate Table QAPP-5 into two separate tables – one table for ground water and one table for surface water.
- Revise to include a note that the Idaho surface water quality criteria are based on assumption of hardness at 100 mg/L.
- Revise to include the Idaho Initial Default Target Levels (IDTL).

6. QAPP Table 6.

- Replace the outdated Region 9 Preliminary Remediation Goals (PRGs) with the EPA Regional Screening Levels.
- Revise PAHs to list IDTL standard.
- Revise acenaphthylene and phenanthrene to list IDTL standard.

7. QAPP Table 7.

Revise the table to note that the Federal Primary Drinking Water MCL for PCBs is 0.0005 mg/L (0.5 ug/L), not 0.1 ug/L as shown in the table.